

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary  
International Paper Company  
Federally Enforceable State Operating Permit (FESOP) Renewal  
6850 West 62<sup>nd</sup> Street  
Chicago, Illinois

Site Identification No.: 031012AGJ

Application No.: 05030086

Schedule

Public Comment Period Begins: August 28, 2014

Public Comment Period Closes: September 27, 2014

Illinois EPA Contacts

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## **I. INTRODUCTION**

International Paper Company currently operates under federally enforceable state operating permit (FESOP) which has expired. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

International Paper Company manufactures corrugated paper boxes. Manufacturing process involves paper gluing with starch-based adhesive cooked at the facility, boards cutting, folding and flexographic printing of the images on the boards. Precut boards are folded and glued with adhesives to form boxes. All these operations are sources of emissions because the adhesives, printing inks and cleaning solutions contain organic solvents, which are emitted to the atmosphere during the printing process as volatile organic material (VOM). The solvents also contain components that are considered hazardous air pollutants (HAPs).

## **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V and Title I of the Clean Air Act and regulations promulgated thereunder, including 35 IAC Part 203 - Major Stationary Sources Construction and Modification. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source for both programs. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs and potential emissions of VOM to less than 100 tons per year.

#### **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has specific standards for units emitting volatile organic material in the Greater Chicago area, e.g., 35 IAC, Part 218, Subpart E – Solvent Cleaning, Subpart F – Coating Operations, Subpart H - Printing Operations, Subpart JJ - Miscellaneous Industrial Adhesives.

The flexographic printing presses as this source are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK.

The paper coating operations performed on the lithographic printing presses are subject to requirements of 35 IAC 218 Subpart F.

Printing operations performed on flexographic printing press are eligible for exemption from emission standards of 35 Ill. Adm. Code 218 Subpart H due to restriction of VOM emissions below 25 tons per year but are subject to general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

Adhesive application operations associated with paper, film, and foil coatings are exempt from 35 IAC 218 Subpart JJ requirements.

The application shows that the plant is in compliance with applicable state and federal emission standards.

#### **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. As explained, printing operations are subject to 35 IAC 218.301, which restricts VOM emissions from any emission unit to less than 8 lb/hr. The paper coating operations are subject to VOM content limitations of 35 IAC 218.204(c) which limits VOM content of the. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit conditions limit HAP usage in inks, coatings and other materials and, respectively, HAP emissions to the level below 40 CFR 63 Subpart KK applicability.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major source thresholds of 10 tons for an individual HAP and 25 tons for combined

HAPs and 100 tons for VOM. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

## **VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.